

Message

From: Shoven, Heather [shoven.heather@epa.gov]
Sent: 9/6/2018 5:18:35 PM
To: Albert, Ryan [Albert.Ryan@epa.gov]; Poy, Thomas [poy.thomas@epa.gov]; Harris, Kimberly [harris.kimberly@epa.gov]; Holsinger, Hannah [Holsinger.Hannah@epa.gov]; Burneson, Eric [Burneson.Eric@epa.gov]; Russell, Sam [russell.sam@epa.gov]; Davis, CatherineM [Davis.CatherineM@epa.gov]; Bell, Kristina [bell.kristina@epa.gov]
Subject: With MDDHS Health letter: MDEQ letter to PWSs with PFOA+PFOS over 70 ppt - RE: MDEQ Response Strategy Details alongside R5 recommended strategy for 1:30 eastern meeting on R5/OGWDW Check in on PFAS DI plan for MI
Attachments: 2018-05-11 DEQ High Level Detect Letter Template - Draft.docx; 05 Greater than 70 MDHHS Advice Letter 05.18.2018.pdf

Just added a pdf with the MDHHS health letter for customers.

From: Shoven, Heather
Sent: Thursday, September 06, 2018 8:17 AM
To:
Cc:
Subject: MDEQ letter to PWSs with PFOA+PFOS over 70 ppt - RE: MDEQ Response Strategy Details alongside R5 recommended strategy for 1:30 eastern meeting on R5/OGWDW Check in on PFAS DI plan for MI

See attached letter that MDEQ sends PWSs with PFOA+PFOS above 70 ppt.

Best wishes,
Heather

*Heather A. Shoven
Chief, Section 1 (Enforcement and Direct Implementation)
Ground Water and Drinking Water Branch
U.S. Environmental Protection Agency, Region 5
(312) 886-0153*

From: Shoven, Heather
Sent: Thursday, September 06, 2018 7:55 AM
To: Albert, Ryan <Albert.Ryan@epa.gov>; Poy, Thomas <poy.thomas@epa.gov>; Harris, Kimberly <harris.kimberly@epa.gov>; Holsinger, Hannah <Holsinger.Hannah@epa.gov>; Burneson, Eric <Burneson.Eric@epa.gov>
Cc: Russell, Sam <Russell.Sam@epa.gov>; Davis, CatherineM <Davis.CatherineM@epa.gov>
Subject: MDEQ Response Strategy Details alongside R5 recommended strategy for 1:30 eastern meeting on R5/OGWDW Check in on PFAS DI plan for MI

Hello everyone,

I just wanted to share the draft template letters that MDEQ provides to PWSs depending on the PFAS testing results (PWS Toolkit webpage at https://www.michigan.gov/pfasresponse/0,9038,7-365-86513_86548_86554---,00.html). You can see what follow-up activities occur based on the results.

Community Water Supplier Toolkit

The Michigan Department of Environmental Quality (MDEQ) has begun a statewide initiative to test drinking water from all schools that use well water and community water supplies. The test is looking for a group of manmade chemicals

called per-and polyfluoroalkyl substances (PFAS). MDEQ is taking this precautionary step of testing these drinking water sources to determine if public health actions are needed.

A toolkit containing communication templates was developed to help water suppliers notify customers of this process and testing results. This is a resource available to your water supply if you choose, it is not required that you use these templates. All templates can be modified to fit your water supply needs. Below is a description of the documents included in this toolkit.

Pre-Notification Template

The pre-notification template provides language for notifying customers of the PFAS testing initiative. Language could be used in a variety of formats such as a press release, newsletter, letter, email, however the company communicates best with customers.

Letter Templates

Letter templates that notify customers of the sample results, what the results mean and the water suppliers next steps on the matter. There are three letters based on the range results may fall in and the recommendations provided by MDEQ.

- MDEQ Less Than 10 Letter Template - no follow-up actions listed in letter to public

R5 recommended strategy - If PFOA + PFOS = Non- detects, then:

- a. Inform the public that samples were collected and results were non-detect.
- b. Direct the public to the EPA-R5 tribal website that includes link to MDEQ website.

- MDEQ Greater Than 10 to 70 Letter Template – no follow-up actions listed in letter to public

R5 recommended strategy - If PFOA + PFOS = Between method detection limit and 70 ppt, then:

- a. Inform the public of the following:
 - i. PFAS samples were collected at their water system and results were at detectable levels of PFOA-PFOS;
 - ii. Confirmation samples are/will be collected and results will be shared when available;
 - iii. What consumers can do if they are concerned about these results (will include more guidance for the susceptible populations) *Possible assistance from IHS and Tribal Health Depts.*
- b. Collect confirmation samples at all sources prior to treatment to assess PFAS levels.
- c. Inform the public of the confirmation sample results,
- d. If the PFOA+PFOS level is still between method detection limit and 70 ppt, inform the public and re-emphasize previous messaging.

MDEQ Greater than 70 Letter Template – see follow-up actions listed in letter to public-

[Water Supply Name] is taking the following measures to ensure the quality of your water:

1. Respond to the MDEQ identifying a plan with timeline to address this contamination
2. Work with the MDEQ to identify and install a treatment technology, If applicable
3. Work with the MDEQ on the removal of the source from operation if feasible
4. Work with MDEQ to evaluate alternatives to replace the lost capacity of the water source
5. MDEQ will resample immediately
6. MDEQ will investigate the source

R5 recommended strategy - If PFOA + PFOS = Above 70 ppt, then:

- a. *Immediately issue a drinking water advisory for susceptible populations – pregnant women, lactating women, and bottle-fed infants and inform the public of the following:
 - iv. PFAS samples were collected at their water system and there were levels of PFOA-PFOS above the health advisory level of 70 ppt;
 - v. Confirmation samples are/will be collected and results will be shared when available;
 - vi. Alternate water is available for the susceptible populations (**NOTE: Need to figure out who is providing bottled water or filters).

- vii. What consumers can do if they are concerned about these results (will include more guidance for the susceptible populations) *NOTE: Possible assistance from IHS and Tribal Health Depts.*
- b. Collect confirmation samples at all sources prior to treatment to assess PFAS levels.
- c. Inform the public of the confirmation sample results.
 - viii. If the PFOA+PFOS level is still above 70 ppt, re-emphasize previous messaging and maintain the drinking water advisory.
 - ix. Let consumers know that an investigation is underway.
 - x. Continue to provide alternate water to susceptible populations until PFOA+PFOS levels are at 70 ppt or below.
- d. Investigate the possible source(s) of PFAS contamination. *(NOTE: Further discussions with MDEQ, tribes, other parts of R5 and HQ to determine who has the resources to do this considering that the PFAS source/responsible party may be on state-owned land.)*
- e. System's long-term options in lieu of alternate water include the following:
 - xi. Drill new wells *(NOTE: no resources at EPA or IHS to fund this);*
 - xii. Install GAC treatment *(NOTE: no resources at EPA or IHS to fund this);*
 - xiii. In lieu of central treatment, provide whole house filters for each household *(NOTE: no resources to fund this); or*
 - xiv. Connect to another water system *(NOTE: most likely not an option).*

* As seen in Parchment MI (where PFOA + PFOS levels were initially seen at 1410 ppt), the State of Michigan's response to elevated PFAS levels is assumed to include issuing a DO NOT DRINK order, providing alternate water to customers, and setting-up an EOC and incident command center. We have reached out to MDEQ to find out if they have a written state-strategy for PFAS follow-up and are awaiting their response.

** The State of Michigan has the machinery in place for a rapid response with each county having an Emergency Operations Center, with quick access to alternate water and communications at the ready. If MDEQ provides bottled water to tribal customers, MDEQ expects reimbursement for the bottled water provided. We have reached out to the state to find out if they could help with confirmation sampling and source investigation (if needed) and are awaiting their response.

Greater than 70 MDHHS Advice Letter *(NOTE: Heather is working on getting this letter from the State.)*

The Michigan Department of Health and Human Services will provide you with a letter containing the department's human health advisement if results are greater than 70 ppt for PFOA and PFOS, two of the PFAS compounds, individually or combined. This letter may not be modified. It is not required you distribute this letter.

PFAS FAQ

Best wishes,
Heather

Heather A. Shoven
Chief, Section 1 (Enforcement and Direct Implementation)
Ground Water and Drinking Water Branch
U.S. Environmental Protection Agency, Region 5
(312) 886-0153

-----Original Appointment-----

From: Albert, Ryan

Sent: Thursday, September 06, 2018 7:48 AM

To: Poy, Thomas; Harris, Kimberly; Shoven, Heather; Holsinger, Hannah; Burneson, Eric

Cc: Russell, Sam; Davis, CatherineM

Subject: Check in on PFAS DI plan for MI

When: Thursday, September 06, 2018 1:30 PM-2:00 PM (UTC-05:00) Eastern Time (US & Canada).

Where: OGWDW in Eric's Office - Number:

Ex. 6 Personal Privacy (PP)

Rescheduled per R5 request.

Number: **Ex. 6 Personal Privacy (PP)**

Extension: **Ex. 6 Personal Privacy (PP)**

Code: **Ex. 6 Personal Privacy (PP)**

First, thank you for the opportunity to opine on the PFAS DI notification plan for Michigan. We look forward to discussing, mindful you would like our input as soon as possible in the event results start coming in Friday.